

Exhibit A

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2017-09-20 09:31:32 EST

19736185986 From: Inessa Goldman

Edward Capozzi, Esq. - 042602004
BRACH EICHLER L.L.C.
101 Eisenhower Parkway
Roseland, New Jersey 07068-1067
(973) 228-5700
Attorneys for Plaintiff

ROBERT PEZZOLLA;

Plaintiff,

vs.

DAVID SANDERS, A & S
SERVICES GROUP, LLC; JOHN
DOE 1-5 (fictitious designations);
XYZ CORPORATION 1-10
(fictitious designations);

Defendants.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION: ESSEX COUNTY

DOCKET NO.: ESX-L-6298-17

Civil Action

COMPLAINT; CERT. PURSUANT TO R. 4:5-1;
DEMAND FOR JURY TRIAL; DESIGN. OF
TRIAL COUNSEL; STATEMENT OF DAMAGES
PURSUANT TO R. 4:5-2

The plaintiff, Robert Pezzolla, by and through his counsel, Brach Eichler LLC, for his Complaint against the defendants, states as follows:

PARTIES

1. At all times material hereto, plaintiff, Robert Pezzolla, was a resident of the State of New Jersey residing at 300 Winston Drive, Apt. 1806, Cliffside Park, Bergen County, New Jersey, 07010.

2. At all times material hereto, defendant, David Sanders, was a resident of the State of Pennsylvania residing at 7 Oriole Circle, Felton, Pennsylvania, 17322.

3. At all times material hereto, defendant, A&S Services Group, LLC, was an entity conducting business in the State of New Jersey with a principal place of business at 310 North Zarfoss Drive, York, Pennsylvania, 17404.

4. At all times material hereto, defendants, John Doe 1-5, were and/or are fictitiously named individuals, the identity, addresses and culpable conduct of said defendants being presently unknown. Said defendants owned, operated, maintained and or controlled their vehicles in such a negligent manner as to injure the plaintiffs. The plaintiffs reserve the right to amend this Complaint upon obtaining knowledge of the identity, addresses and culpable conduct of the defendants represented herein as John Doe 1-5.

5. At all times material hereto, defendants, XYZ Corporation 1-10, were and/or are fictitiously named partnerships, professional associations and/or professional corporations (hereinafter "partnerships") which exist under the laws of the State of New Jersey, the identity, addresses and culpable conduct of said defendants being presently unknown. Said defendants owned, operated, maintained and or controlled their vehicles in such a negligent manner as to injure the plaintiffs. The plaintiffs reserve the right to amend this Complaint upon obtaining knowledge of the identity, addresses and culpable conduct of the defendants represented herein as XYZ Corporation 1-10.

6. All defendants acted by and through their respective agents, servants, employees, officers, directors or others, actual and/or apparent, any and all of which were then and there acting within the course and scope of their employment, duties or agency, actual and/or apparent.

FACTS COMMON TO ALL COUNTS

7. The plaintiff herein incorporates paragraphs 1 through 6 as though the same were set forth herein at length.

8. On or about November 16, 2016, plaintiff, Robert Pezzolla, was operating a motor vehicle traveling south on the New Jersey Turnpike at or around milepost 109.9 in Newark, New Jersey.

9. At the same time and place, defendant, David Sanders, was operating a commercial vehicle, owned by defendant, A & S Services Group, LLC, traveling south on the New Jersey Turnpike at or around milepost 109.9 in Newark, New Jersey.

10. At the aforementioned time and place, the defendants had a duty to maintain, control, and operate their motor vehicles in a safe and prudent manner so as to not create an unreasonable and foreseeable risk of injury to others.

FIRST COUNT

11. The plaintiff herein incorporates paragraphs 1 through 10 as though the same were set forth herein at length.

12. At the above time and place, the defendants, so carelessly, negligently and recklessly operated, maintained or repaired their vehicles so as to cause a collision with the plaintiff's vehicle.

13. At the same time and place, defendants, John Doe 1-5 (fictitious designations) and XYZ Corporation 1-10 (fictitious designations), and any or all of the aforementioned defendants' agents, servants, and/or employees, so carelessly, negligently and recklessly operated, maintained or repaired said vehicle so as to cause the within collision.

14. As a result of the individual, joint and/or several tortious conduct of the various defendants as set forth above, plaintiff, Robert Pezzolla, was caused to sustain multiple and severe injuries to his person.

15. As a further result of the individual, joint and/or several tortious conduct of the various defendants as set forth above and by reason of the injuries sustained, plaintiff, Robert Pezzolla, has in the past and will in the future be obliged to receive and undergo medical attention and care and to

expend various sums of money and/or to incur various expenses for care and treatment of the injuries he has suffered, all to his great detriment and loss.

16. As a further result of the individual, joint and/or several tortious conduct of the various defendants as set forth above and by reason of the injuries sustained, plaintiff, Robert Pezzolla, has sustained an impairment of his earning capacity and power, all to his great detriment and loss.

17. As a further result of the individual, joint and/or several tortious conduct of the various defendants as set forth above and by reason of the injuries sustained, plaintiff, Robert Pezzolla, has in the past incurred and will in the future continue to incur other financial losses or expenses, all to his great detriment and loss.

18. As a further result of the individual, joint and/or several tortious conduct of the various defendants as set forth above and by reason of the injuries sustained, plaintiff, Robert Pezzolla, has in the past suffered and will in the future continue to suffer great pain, suffering, agony, and mental anguish, all to his great detriment and loss.

19. As a further result of the individual, joint and/or several tortious conduct of the various defendants as set forth above and by reason of the injuries sustained, plaintiff, Robert Pezzolla, has in the past and will in the future be hindered from attending to his daily duties, functions and occupation, all to his great detriment and loss.

WHEREFORE, plaintiff, Robert Pezzolla, demands judgment against the defendants individually, jointly, severally, and/or in the alternative, for damages, interest, attorney's fees, costs of suit, and such other relief as the Court may deem proper.

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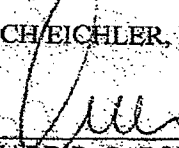
2017-09-20 09:31:32 EST

19736185986 From: Inessa Goldman

Respectfully submitted,

BRACH EICHLER, L.L.C.

BY:


EDWARD P. CAPOZZI, ESQUIRE
Attorney for Plaintiffs

Dated: August 30, 2017

DEMAND FOR TRIAL BY JURY

Plaintiffs hereby demand a trial by jury as to all issues.

BRACH EICHLER, L.L.C.

BY:


EDWARD P. CAPOZZI, ESQUIRE
Attorney for Plaintiffs

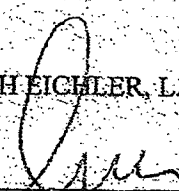
Dated: August 30, 2017

DESIGNATION OF TRIAL COUNSEL

Pursuant to R. 4:25-4, Edward P. Capozzi, Esquire, is hereby designated as trial counsel on behalf of plaintiff.

BRACH EICHLER, L.L.C.

BY:


EDWARD P. CAPOZZI, ESQUIRE
Attorney for Plaintiffs

Dated: August 30, 2017

CERTIFICATION PURSUANT TO R. 4:5-1

I, Edward P. Capozzi, Esquire, hereby certify that the facts contained in the within matter are not subject of any other action pending in any other court or of a pending arbitration proceeding to the best of my knowledge or belief. Further, other than the parties set forth in this pleading, I know of no other parties that should be joined in the above action. I also certify that the facts contained in the within matter are true and correct to the best of my knowledge and belief. If any of the statements made by me are willfully false, I am subject to punishment.

BRACH EICHLER, L.L.C.

BY: EDWARD P. CAPOZZI, ESQUIRE
Attorney for Plaintiffs

Dated: August 30, 2017

STATEMENT OF DAMAGES CLAIMED PURSUANT TO R. 4:5-2

Plaintiff requests damages in the amount of \$3,000,000.00 (Three-Million Dollars) with regard to the above-captioned case.

BRACH EICHLER, L.L.C.

BY: EDWARD P. CAPOZZI, ESQUIRE
Attorney for Plaintiff



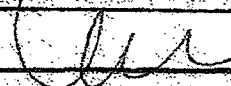
Dated: August 30, 2017


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Appendix XII-B1

	CIVIL CASE INFORMATION STATEMENT (CIS) Use for initial Law Division Civil Part pleadings (not motions) under Rule 4:5-1 Pleading will be rejected for filing, under Rule 1:5-6(c), if information above the black bar is not completed or attorney's signature is not affixed.		REPORT BY CLERK'S OFFICE ONLY PAYMENT TYPE: <input type="checkbox"/> CK <input checked="" type="checkbox"/> CC <input type="checkbox"/> CA CHG/CK NO.: AMOUNT: OVERPAYMENT: BATCH NUMBER:	
	ATTORNEY/PRO SE NAME Edward R. Capozzi, Esq.		TELEPHONE NUMBER	
	FIRM NAME (if applicable) Brach Eichler, LLC		COUNTY OF VENUE Essex	
	OFFICE ADDRESS 101 Eisenhower Parkway Roseland, NJ 07068		DOCKET NUMBER (when available) 1-6298-17	
NAME OF PARTY (e.g., John Doe, Plaintiff) Robert Pezzolla		CAPTION Robert Pezzolla vs. David Sanders, et. al.		
CASE TYPE NUMBER (See reverse side for listing) 603N	HURRICANE SANDY RELATED? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	IS THIS A PROFESSIONAL MALPRACTICE CASE? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO IF YOU HAVE CHECKED "YES," SEE N.J.S.A. 2A:53A-27 AND APPLICABLE CASE LAW REGARDING YOUR OBLIGATION TO FILE AN AFFIDAVIT OF MERIT.		
RELATED CASES PENDING? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		IF YES, LIST DOCKET NUMBERS		
DO YOU ANTICIPATE ADDING ANY PARTIES (arising out of same transaction or occurrence)? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		NAME OF DEFENDANT'S PRIMARY INSURANCE COMPANY (if known): <input type="checkbox"/> NONE <input type="checkbox"/> UNKNOWN		
THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE.				
CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION				
DO PARTIES HAVE A CURRENT, PAST OR RECURRENT RELATIONSHIP? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		IF YES, IS THAT RELATIONSHIP: <input type="checkbox"/> EMPLOYER/EMPLOYEE <input type="checkbox"/> FRIEND/NEIGHBOR <input type="checkbox"/> OTHER (explain) <input type="checkbox"/> FAMILIAL <input type="checkbox"/> BUSINESS		
DOES THE STATUTE GOVERNING THIS CASE PROVIDE FOR PAYMENT OF FEES BY THE LOSING PARTY? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO				
USE THIS SPACE TO ALERT THE COURT TO ANY SPECIAL CASE CHARACTERISTICS THAT MAY WARRANT INDIVIDUAL MANAGEMENT OR ACCELERATED DISPOSITION				
 DO YOU OR YOUR CLIENT NEED ANY DISABILITY ACCOMMODATIONS? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		IF YES, PLEASE IDENTIFY THE REQUESTED ACCOMMODATION		
WILL AN INTERPRETER BE NEEDED? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		IF YES, FOR WHAT LANGUAGE?		
I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with Rule 1:36-7(b).				
ATTORNEY SIGNATURE: 				

<div>  <div> <div>Side 2</div> <div> CIVIL CASE INFORMATION STATEMENT (CIS) Use for initial pleadings (not motions) under Rule 4:5-1 </div> </div> </div>	
CASE TYPES (Choose one and enter number of case type in appropriate space on the reverse side.)	
Track I - 150 days' discovery	
151	NAME CHANGE
175	FORFEITURE
302	TENANCY
399	REAL PROPERTY (other than Tenancy, Contract, Condemnation, Complex Commercial or Construction)
502	BOOK ACCOUNT (debt collection matters only)
505	OTHER INSURANCE CLAIM (including declaratory judgment actions)
506	PIP COVERAGE
510	UM or UIM CLAIM (coverage issues only)
511	ACTION ON NEGOTIABLE INSTRUMENT
512	LEMON LAW
501	SUMMARY ACTION
502	OPEN PUBLIC RECORDS ACT (summary action)
999	OTHER (briefly describe nature of action)
Track II - 300 days' discovery	
305	CONSTRUCTION
589	EMPLOYMENT (other than CEPA or LAD)
599	CONTRACT/COMMERCIAL TRANSACTION
603N	AUTO NEGLIGENCE - PERSONAL INJURY (non-verbal threshold)
603Y	AUTO NEGLIGENCE - PERSONAL INJURY (verbal threshold)
605	PERSONAL INJURY
610	AUTO NEGLIGENCE - PROPERTY DAMAGE
621	UM or UIM CLAIM (includes bodily injury)
699	TORT - OTHER
Track III - 450 days' discovery	
605	CIVIL RIGHTS
601	CONDEMNATION
602	ASSAULT AND BATTERY
604	MEDICAL MALPRACTICE
606	PRODUCT LIABILITY
607	PROFESSIONAL MALPRACTICE
608	TOXIC TORT
609	DEFAMATION
615	WHISTLEBLOWER / CONSCIENTIOUS EMPLOYEE PROTECTION ACT (CEPA) CASES
617	INVERSE CONDEMNATION
618	LAW AGAINST DISCRIMINATION (LAD) CASES
Track IV - Active Case Management by Individual Judge / 450 days' discovery	
155	ENVIRONMENTAL/ENVIRONMENTAL COVERAGE LITIGATION
303	MT. LAUREL
505	COMPLEX COMMERCIAL
513	COMPLEX CONSTRUCTION
514	INSURANCE FRAUD
620	FALSE CLAIMS ACT
701	ACTIONS IN LIEU OF PREROGATIVE WRITS
Multicounty Litigation (Track IV)	
271	ACCUTANE/ISOTRETINOIN
274	RISPERDAL/SEROQUEL/ZYPREXA
281	BRISTOL-MYERS SQUIBB ENVIRONMENTAL
282	FOSAMAX
285	STRYKER TRIDENT HIP IMPLANTS
286	LEVAQUIN
287	YAZ/YASMIN/OCCELLA
288	REGLAN
290	POMPTON LAKES ENVIRONMENTAL LITIGATION
291	PELVIC MESH/GYNECARE
292	PELVIC MESH/BARD
293	DEPUY ASR HIP IMPLANT LITIGATION
295	ALLODERM REGENERATIVE TISSUE MATRIX
298	STRYKER REJUVENATE/ABG II MODULAR HIP STEM COMPONENTS
297	MIRENA CONTRACEPTIVE DEVICE
299	OLMESARTAN/MEDOXOMIL/MEDICATIONS/BENICAR
300	TALC-BASED BODY POWDERS
601	ASBESTOS
623	PROPECIA
624	STRYKER LIFT CoCr V40 FEMORAL HEADS
If you believe this case requires a track other than that provided above, please indicate the reason on Side 1, in the space under "Case Characteristics."	
Please check off each applicable category <input type="checkbox"/> Putative Class Action <input type="checkbox"/> Title 59	

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19736185986 From: Inessa Goldman

JOHNS COUNTY - CIVIL DIVISION
 SUPERIOR COURT OF NC
 405 MARTIN LUTHER KING JR BLVD
 NASHVILLE, NC 27852

COURT TELEPHONE NO. (973) 776-9300
 COURT HOURS 8:30 AM - 4:30 PM

TRACE ASSIGNMENT NOTICE

DATE: SEPTEMBER 01, 2017
 RE: PEZZOLLA VS SANDERS
 TICKET: ESX A - 00679F 17

THE ABOVE CASE HAS BEEN ASSIGNED TO: TRACE 2.

DISCOVERY IS 300 DAYS AND RUNS FROM THE FIRST ANSWER OR 90 DAYS
 FROM SERVICE ON THE FIRST DEFENDANT, WHICHEVER COMES FIRST.

THE JUDICIAL JUDGE ASSIGNED IS: HON KEITH E. LYNOTT

IF YOU HAVE ANY QUESTIONS, CONTACT TEAM 002
 AT: (573) 776-3400

IF YOU BELIEVE THAT THE TRACE IS INAPPROPRIATE YOU MUST FILE A
 CERTIFICATION OF GOOD CAUSE WITHIN 30 DAYS OF THE FILING OF YOUR PLEADINGS.
 PLAINTIFF MUST SERVE COPIES OF THIS FORM ON ALL OTHER PARTIES IN ACCORDANCE
 WITH R. 4:56-2.

ATTENTION:

ATT: EDWARD P. GARGIOLI
 BRACH RECHLER LLC
 101 EISENHOWER PARKWAY
 ROSELAND, NC 27068-1012

JCHAME